

State Water Resources Control Board

November 13, 2017

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7016 3010 0000 5907 1790

Mr. Gary Dodson
Manager, Fleet Maintenance
Elk Grove Unified School District
8421 Gerber Road
Sacramento, California 95628
gdodson@egusd.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT ELK GROVE UNIFIED SCHOOL DISTRICT TRANSPORTATION
DEPARTMENT, 8421 GERBER ROAD, SACRAMENTO**

Dear Mr. Dodson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 25, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Financial Responsibility – A current Certificate of Financial Responsibility was not in CERS or onsite at the time of inspection.	All	October 25, 2017	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
2	Failure to Provide Designated Operator (DO) Training – The previous DO training was conducted on August 25, 2016. The next one was not performed until September 21, 2017. DO training must be conducted annually.	All	August 26, 2017	September 21, 2017	23 CCR 2715(f)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Monitor Product Piping – The sensors located inside the diesel turbine sumps were raised and not located at the lowest point in the sump. Additionally, the sensor located in the waste oil piping sump was not in a vertical position and therefore, unable to detect a leak at the earliest opportunity.	All	October 25, 2017	Ongoing	23 CCR 2630(d)
4	Failure to Tag Monitoring Equipment – No tags were attached to the line leak detectors located in each of the diesel turbine sumps.	All	October 25, 2017	Ongoing	23 CCR 2638(f)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Sacramento County Environmental Management Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Jenea Monasterio
Environmental Specialist
Sacramento County Environmental
Management Department
10590 Armstrong Avenue, Suite A
Sacramento, California 95655
monasterioj@saccounty.net

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Jennea Monasterio
Environmental Specialist
Sacramento County Environmental
Management Department
monasterioj@saccounty.net